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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

CHRISTINA TORREZ,

Plaintiff,

vs.

TEEMA, INC., a Delaware
corporation; and DOES 1 through
50, inclusive,

Defendants.

Case No.: 2:22-CV-01531-TLN-KJN

**JOINT STIPULATION TO CONTINUE
VDRP MEDIATION COMPLETION
DEADLINE; ORDER**

TO THE HONORABLE COURT:

Plaintiff Christina Torrez and Defendant TEEMA, Inc., by and through their undersigned counsel, hereby jointly move this Court for an order continuing the Voluntary Dispute Resolution Program (“VDRP”) mediation completion deadline, as set forth below, for the following reasons:

1. This case was removed from state court on August 31, 2022.

2. On December 28, 2022, the Parties prepared and filed a Joint Scheduling Report which set forth their agreement to submit the matter to mediation. The Court and the VDRP Administrator appointed Robert Chalfant as the VDRP neutral attorney on November 23, 2022.

3. The Parties spent December exchanging written discovery and serving subpoenas on third parties.

4. The Parties require additional time to complete depositions, including the depositions of Plaintiff and Defendant in advance of the VDRP mediation deadline, which is currently set for February 22, 2023.

5. The Parties have met and conferred and now request an additional forty-five (45) days from the current deadline of February 22, 2023 to complete depositions and the VDRP mediation. The continued deadline to complete the VDRP mediation would be on or about **April 10, 2023**.

6. Based on the foregoing, the Parties respectfully submit that good cause exists and request that the court grant this joint request.

DATED: January 17, 2023

DIVERSITY LAW GROUP, P.C.

By: /s/ Kristen M. Agnew
Larry W. Lee
Kristen M. Agnew
Nicholas Rosenthal

DATED: January 17, 2023

FISHER & PHILLIPS LLP

By: /s/ Amy L. Lessa

Amy L. Lessa

Lauren Bushman

Attorneys for Defendant TEEMA. Inc.

ATTESTATION REGARDING ELECTRONIC SIGNATURES

I, Amy Lessa, attest that all other signatories to this document, on whose behalf this filing is submitted, concur in the filing's content and have authorized this filing. I declare under penalty of perjury, under the laws of the United States of America and the State of California, that the foregoing is true and correct.

/s/ Amy L. Lessa

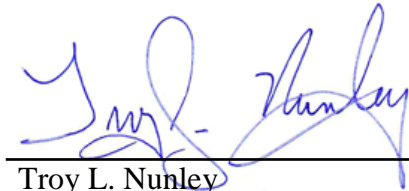
Amy L. Lessa

ORDER

Good cause appearing, the Joint Stipulation to Continue the VDRP Mediation Completion Deadline is granted, and IT IS HEREBY ORDERED that the VDRP Mediation Completion Deadline be continued to April 10, 2023.

IT IS SO ORDERED.

DATED: January 17, 2023



Troy L. Nunley
United States District Judge